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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CASE NO. CR 4:24-366 YGR

On March 5, 2025, the Court set a schedule for the Defendant's motion to suppress. ECF 39.

Pursuant to the schedule, counsel for Mr. Kingsley filed a motion to suppress on April 8, 2025. Since the motion was filed the parties have continued discussions regarding potential resolution of the case. In light of these discussions, the parties stipulated to continue the briefing on the motion to suppress. ECF 48. On April 28, 2025, the Court granted the parties' stipulation. ECF 49. The parties have continued to discuss potential resolution of the case and request a further continuance of the motion to suppress. The parties propose the following continuance:

- Government response: July 22, 2025
- Defense reply: August 6, 2025
- Hearing on motion to suppress: August 14, 2025

1 Accordingly, the parties STIPULATE and agree that this matter should be CONTINUED until
2 the motion to suppress hearing date. The parties STIPULATE and agree that excluding time until that
3 date is appropriate due to delay resulting from a pretrial motion and is warranted for the effective
4 preparation of counsel. *See* 18 U.S.C. § 3161(h)(1)(C), (h)(7)(B)(iv). The parties further stipulate and
5 agree that the ends of justice served by excluding the time from June 26, 2025, through August 14, 2025,
6 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant
7 in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

8
9 DATED: May 29, 2025

Respectfully submitted,

10 CRAIG H. MISSAKIAN
11 United States Attorney

12 _____/s/
13 MAYA KARWANDE
14 Assistant United States Attorney

15
16 DATED: May 29, 2025

Respectfully submitted,

17 JODI LINKER
18 Federal Public Defender

19 _____/s/
20 ELISSE LAROUCHE
21 Assistant Federal Public Defender

1 [PROPOSED] ORDER
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3 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court
4 finds that failing to exclude the time from June 26, 2025 through August 14, 2025 would unreasonably
5 deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking
6 into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). Delay is also warranted based
7 on delay resulting from a pretrial motion. *See* 18 U.S.C. § 3161(h)(1)(C). The Court further finds that the
8 ends of justice served by excluding the time from June 26, 2025 through August 14, 2025 from
9 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
speedy trial. Therefore, and with the consent of the parties, it is hereby

10 ORDERED that the time from June 26, 2025 through August 14, 2025 shall be excluded from
11 computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

12 ORDERED that this matter be continued to August 14, 2025 at 2:00PM for a HEARING ON
13 MOTION TO SUPPRESS.

14 ORDERED that the parties will follow the schedule below for the motion to suppress.

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- 16 • Government response: July 22, 2025
- 17 • Defense reply: August 6, 2025
- 18 • Hearing on motion to suppress: August 14, 2025

19 Dated: June 2, 2025

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21 HON. YVONNE GONZALEZ ROGERS
22 United States District Judge